Matanuska-Susitna Borough

September 17, 2019

Tina McMaster-Goering Bureau of Land Management Fairbanks District Office 222 University Avenue, Fairbanks AK 99709

Email: tmcmastergoering@blm.gov

National Park Service Greg Dudgeon, Superintendent, Gates of the Arctic National Park and Preserve 4175 Geist Road, Fairbanks, AK 99709 E-mail: yuga ambler road@nps.gov

To Whom it may concern;

I am writing in support of the proposed Ambler Mining District Industrial Access Project road (AMDIAP). It is imperative that we have growth opportunities for the State and developing all our natural resources is one way we can insure jobs are available now and into the future for ourselves and our children. I have the following comments:

I believe the shortest route, or the 211mile Alternative A will have the least impacts since it is the shortest route.

The BLM must not choose the No-Action Alternative. The BLM authority here is to grant a Right-of-Way across only the BLM lands – the majority of which occur in the Pipeline Utility Corridor and are administered by the current Utility Corridor Land Use Management Plan EIS.

AMDIAP does NOT cross any lands classified as Wilderness.

Alaska has laws that govern the use of NOA for road construction materials. I full confidence in AIDEA to meet and exceed all existing laws, including State of Alaska laws.

Subsistence Resources are clearly the most important concern of local people living along the Kobuk and Koyukuk River systems. People living in Bettles/Evansville, Allakaket, Alatna, Hughes, Huslia, Kobuk, Shungnak, Ambeler, Kiana and Noorvik and other communities further away have all expressed concerns over potential impacts to subsistence resources. In several meetings it was suggested to have a Subsistence Committee made up of participants from each or the villages along the Kobuk and Koyukuk river systems. I believe this would the best way to ensure local participation



and decision making to ensure minimal impacts to these important subsistence resources.

Villages in the Kobuk and Koyukuk regions that choose to connect to the Ambler Road could have opportunity to bring in commercial goods, fuel and equipment at significantly lower costs than currently available. In addition, they could decide to access the Fiber Optic high speed internet for tele-medicine and tele-education. These important improvements would only be made possible if the Ambler Road is approved.

This project is a great investment for the citizens of Alaska. AMDIAP will be a private road funded by a Public-Private Partnership (3P) with AIDEA issuing bonds paid for by private investors, not State of Alaska funds. This is a proven 3P model used to build infrastructure at the Red Dog mine that has generated wealth for the Northwest Arctic Borough, NANA and other Alaska Native corporations through 7i and 7j payments, as well as to the State of Alaska General fund. Now that the bond holders have been paid off, AIDEA pays a dividend to the Alaska General Fund as a result of its dividend policy. Subject to AS 44.88.088, AIDEA pays an annual dividend to the State, based on 25-50% of the Authority's statutory net income. Since 1997, AIDEA has paid more than \$407 million in dividends to the State of Alaska General Fund.

The Ambler Road would be a PRIVATE ROAD with no public access provided to ensure that no hunting or fishing would take place along the road corridor. The Department of Interior must consider the total impacts of the Alt. and Alt. B alternatives, and since Alt. B is 17 miles longer than Alt. A, it is clear that Alt. A has fewer overall impacts on all scores - especially when the scores for the impacts of Alt. B are adjusted for the obvious oversight of Alt. B route paralleling the Kobuk and Reed Wild and Scenic Rivers as discussed above.

State Mining royalties and taxes paid for by mining will help support the State General Fund and help grow the Alaska economy at a time when the economy needs support. Every year, the mining industry in Alaska contributes millions of dollars to the state economy through mining license taxes, rents, royalties, corporate income tax, material sales, and taxes paid to municipalities. In 2018, the mining industry in Alaska paid over \$148 million to the state, and an additional \$34 million to municipalities.

Alaska needs to diversify its economy away from oil dependence and mining provides secure high paying jobs. Mining-related jobs pay over \$100,000 annually. Developing two mines in the Ambler Mining District (not at all a stretch given the known endowment) would create approximately a thousand new direct jobs at the mines and more along the transportation corridor - jobs in the Kobuk and Koyukuk regions hauling concentrates and maintaining or providing security along AMDIAP; jobs with the Alaska Railroad hauling concentrates from Fairbanks to Anchorage, and jobs at the Port in Anchorage loading the cargo ships. These are full-time, year-round jobs more than capable of supporting a family. We need more of these jobs in Alaska.

Finally, our reliance on oil to support our State economy must be curtailed. Driven by the global Climate Action Campaign, there is a strong mandate to transition our global energy and transportation infrastructure to non-carbon-based energy production (alternative energy including wind, solar, hydro/tidal, geothermal and nuclear) and transportation (non-internal combustion engines including all-electric, hybrid and hydrogen fuel cells). Alternative energy and transportation solutions to Climate Change require 3 to 15 times more copper than current carbon-based energy and transportation. There is little doubt that the demand for oil will be curtailed over the next several decades as the world makes this transition. While oil use will likely be curtailed in this global transition, copper usage, along with a host of other metals, will have to increase substantially given their extensive use in any reasonable solution to Climate Change. Alaska currently funds approximately \$4 Billion in education, health care and other social programs, and 90% is funded by oil production. We must diversify our economy and mining is an area that can provide more revenues to the State and offer good paying jobs, all while providing metals that will used to build a non-carbon-based, green energy and transportation future - the only meaningful solution to address Climate Change.

Thank you for the opportunity to provide comment on the proposed Ambler Road BLM draft EIS and National Park Service EEA. It is much appreciated.

Sincerely,

John M. Moosey Borough Manager

